



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

ENFORCEMENT DIVISION
WASTE AND CHEMICAL SECTION
RCRA COMPLIANCE EVALUATION LETTER

October 7, 2015

Robert C. Vance III
Keck Medical Center
Safety & Emergency Mgmt. Office
1500 San Pablo Street
Los Angeles, CA 90033

Dear Mr. Vance:

On August 20, 2015, representatives of the U.S. Environmental Protection Agency (EPA) conducted an unannounced compliance evaluation inspection (CEI) of the USC Keck Medical Center of (KMC) with EPA ID No: CAT000617597. The purpose of the inspection was to determine KMC's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, and the California Code Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

The inspectors conducted a physical inspection of the facility and reviewed records related to KMC's hazardous waste management practices. A copy of the inspection report identifies areas of noncompliance with RCRA regulations and potential violations of the State of California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulation.

On October 1, 2015 KMC provided documentation that the deficiencies noted during the inspection were corrected. Because EPA did not find any significant violations, we anticipate no further action at this time. If you have any questions related to this letter, please contact Daniel Fernandez of my staff at (415) 972-3299.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. McDaniel", is positioned above the typed name.

Douglas K. McDaniel
Chief, Waste and Chemical Section
Enforcement Division

Prepared by:



Daniel Fernandez

Inspector, Waste and Chemical Section

Cc: Kristine Green, DTSC

A. Introduction

On August 20, 2015, representative of the U.S. Environmental Protection Agency (EPA) conducted an unannounced hazardous waste management compliance evaluation inspection (CEI) of the USC Keck Medical Center (USC-KMC) which is part of the USC Health Services Campus. The purpose of the inspection was to determine USC-KMC's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, and the California Code Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

B. Facility Background

| | |
|---|---|
| Facility Web-Site | http://keck.usc.edu/ |
| Site History | <p>The hospital has operated in its current location since the late 1980s. The hospital was independently managed and known as the University Hospital until 2010, when it was purchased by USC.</p> <p>In 2010 the University Hospital became the USC Keck Medical Center and became part of the USC's Health Services System.</p> |
| Number of Employees | Approximately 478 |
| Hours of Operation | 24/7/365 |
| Facility Operations | The facility includes a 24/7 hospital with 250 beds, an inpatient and outpatient pharmacy, and they serve roughly 10,000 new patients per year. |
| RCRA and Non-RCRA Hazardous Wastes Streams | <u>EPA Waste Codes</u> : D001, D002, D009, D011, F003, U035, U058, universal waste lamps and batteries, used oil |
| Generator Status | Keck Medical Center is small quantity generator (SQG) of hazardous waste, however, the hospital is treated as a large quantity generator (LQG) because all of the HW generated by USC Health Services System is shipped under the same EPA ID number. |
| Compliance History | An inspection of the Norris Cancer Center was conducted on September 16, 2014, however, Keck Hospital was not inspected. The Norris Cancer Center is part of the USC Health Care Complex. |
| SIC/NAICS Codes | NAICS Code: 622310 – Specialty Hospitals |

C. On-Site Inspection

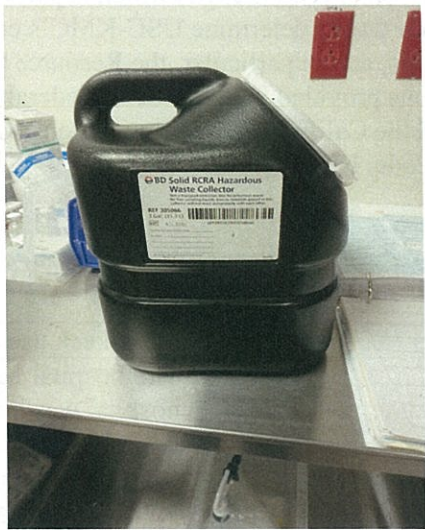
Inspections were conducted at Pharmacy, Pathology Laboratory, Clinical Laboratory and all hazardous accumulation areas.

1. Facility and Satellite Accumulation Areas

The inspectors observed 2 hazardous waste satellite accumulation areas ("SAAs") in the Pathology Lab, a SAA in the Clinical Lab and 2 SAAs in the Pharmacy.

The waste was being accumulated in these areas in 2-gallon poly containers.

The following table summarizes the observations made during the on-site inspection portion of the CEI for all areas except the facility's waste accumulation area (i.e., less than 90/180 day storage area).

| Observation | Photograph |
|--|---|
| <p>The inspectors observed a black container for RCRA waste in vials in the pharmacy SAA. A list attached to the container identified the exact contents and arsenic trioxide (P012) was one of them.</p> <p>The label was missing the hazardous properties of the waste on the container; composition and physical state of the wastes; statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.); the name and address of the person producing the waste.</p> |  <p>Photo No. 1</p> |

2. Waste Accumulation Area (less than 90/180 day hazardous waste accumulation area)

USC-KMC did not have a true 180-day hazardous waste accumulation area at the time of the inspection. USC has a contract with Stericycle which removes hazardous waste containers directly from the hospital's SAAs. The following table summarizes the observations made during the walk-through portion of the facility's waste accumulation areas.

D. Record Review

| Record | Year(s) | Observation(s) |
|---|----------------|--|
| Manifests | 2014 - current | Reviewed |
| Land Disposal Restriction ("LDR") Notifications | 2014 - current | Reviewed |
| Contingency Plan/Emergency Contact Info | Current | The location of the emergency equipment was missing. |
| Training Records and Documentation | Current | Reviewed |
| Biannual Report System | 2011 & 2013 | Reviewed |

RCRA POTENTIAL VIOLATIONS

| STATUTE OR REGULATION | REGULATION SUMMARY | FINDING(s) | FACILITY RESPONSE |
|--|--|--|--|
| 22 CCR §66265.52(e) 40 CFR §265.52(e) | The plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities | The plan did not have a list of all of the emergency equipment at the facility, the location of the equipment and a brief outline of the equipment capabilities. | USC-KMC provided EPA with the list of the emergency equipment, locations and capabilities. |

CALIFORNIA CCR POTENTIAL VIOLATION

| STATUTE OR REGULATION | REGULATION SUMMARY | FINDING(s) | FACILITY RESPONSE |
|-----------------------------|---|--|--|
| 22 CCR 66262.34(e)(1)(E) | A generator may accumulate as much as 55 gallons of hazardous waste at or near the point of generation without a permit as long as certain conditions are met; these conditions include clearly marking the initial date of accumulation and the hazardous properties of the waste on the container; composition and physical state of the wastes; statement or statements which call attention to the particular hazardous properties of the waste; he name and address of the person producing the waste. | A container of hazardous waste in the Lab SAA was not labeled with hazardous properties of the waste on the container; composition and physical state of the wastes; statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.); the name and address of the person producing the waste. | The facility labeled the container as required by the regulations. |

